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Attorneys for Plaintiffs **KAREN LUCIA,**
JEFFREY LUCIA, and GAIL CAPLAN,
and persons similarly situated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KAREN LUCIA and JEFFREY LUCIA,
individually, and on behalf of others
similarly situated,

Plaintiffs,

v.

WELLS FARGO BANK, N.A. d/b/a
WELLS FARGO HOME MORTGAGE;
and DOES 1 through 10,

Defendants.

Case No. 3:10-cv-04749-VC

CLASS ACTION

STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEADLINES
PURSUANT TO LOCAL RULE 79-5

Hon. Vince Chhabria

PHILLIP R. CORVELLO, individually,
and on behalf of others similarly situated,

Plaintiff,

v.

WELLS FARGO BANK, N.A. d/b/a
WELLS FARGO HOME MORTGAGE
d/b/a AMERICA'S SERVICING
COMPANY,

Defendant.

Case No. 10-cv-05072-VC

AMIRA JACKMON, individually, and on
behalf of others similarly situated,

Plaintiff,

v.

AMERICA'S SERVICING COMPANY
and WELLS FARGO BANK, N.A.,

Defendants.

Case No. 11-cv-03884-VC

TO THE HONORABLE VINCE CHHABRIA, UNITED STATES DISTRICT JUDGE,
PLAINTIFFS KAREN AND JEFFREY LUCIA, GAIL CAPLAN, PHILLIP R. CORVELLO, AND
AMIRA JACKMON, THEIR COUNSEL OF RECORD, AND ALL OTHER INTERESTED
PARTIES:

PLEASE TAKE NOTICE that pursuant to Civ. L.R. 6-1(b), 6-2, and 7-12, plaintiffs Karen
Lucia, Jeffrey Lucia, Gail Caplan, Phillip R. Corvello, and Amira Jackmon ("plaintiffs") and
defendant Wells Fargo Bank, N.A. ("Wells Fargo") (collectively, the "Parties"), by and through their
respective counsel, stipulate and agree as follows:

WHEREAS, the Court entered a Scheduling Order in these cases on February 11, 2015 (Dckt.
No. 118) ("Scheduling Order"); and

WHEREAS, the Scheduling Order requires plaintiffs to file their motion(s) for class
certification by July 2, 2015; and

WHEREAS, plaintiffs may submit certain documents, testimony, or other information in

1 support of their motions for class certification that have otherwise been designated as confidential by
2 Wells Fargo or plaintiffs pursuant to the respective protective orders entered in the cases; and

3 WHEREAS, Local Rule 79-5 requires that plaintiffs file such documents, testimony, or other
4 information in redacted form, and file accompanying administrative motion(s) to seal; and

5 WHEREAS, Local Rule 79-5 further requires that Wells Fargo submit a response (or
6 responses) to the Court in support of sealing within 4 days of the filing of plaintiffs' administrative
7 motion(s) to seal; and

8 WHEREAS, because plaintiffs' deadline for filing their motions for class certification falls
9 directly before the federal Fourth of July holiday (on July 2, 2015), and in order to provide Wells
10 Fargo with adequate time to evaluate the material filed by plaintiffs and prepare, as necessary,
11 declarations in support of sealing, the Parties have conferred and agreed upon extending the deadline
12 for plaintiffs to file their respective administrative motions to seal, if any, and the deadline for Wells
13 Fargo to respond to same; and

14 WHEREAS, the Parties agree that no party will be prejudiced and no other deadlines will be
15 affected by the extension.

16 **IT IS HEREBY STIPULATED AND AGREED** by the Parties as follows:

17 1. Plaintiffs' deadline to file their administrative motion(s) to seal, if any, pursuant to
18 Local Rule 79-5 ("Administrative Motion(s)") is extended through and until July 8, 2015.

19 2. Wells Fargo's deadline to submit its response(s) to the Administrative Motion(s) is
20 extended through and until July 22, 2015.

21 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**
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KAREN and JEFFREY LUCIA and GAIL
CAPLAN*

Dated: June 22, 2015

I, IRENE C. FREIDEL, am the ECF User whose ID and password are being used to file this document and, in compliance with Local Rule 5-1(i)(3), hereby attest that all signatories concur with this filing.

<i>Irene C. Freidel</i>
Irene C. Freidel

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 23, 2015



Hon. Vince Chhabria
United States District Judge